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Attorneys for Defendants
C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability
Litigation

No. 2:15-MD-02641-DGC

**DEFENDANTS' NOTICE OF
LODGING UNDER SEAL
CERTAIN EXHIBITS IN
SUPPORT OF BARD'S MOTION
TO EXCLUDE THE OPINIONS
OF DARREN M. HURST, M.D.**

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively
"Bard"), pursuant to the Stipulated Protective Order (Doc. 269) and Local Civil Rule 5.6
file this notice of lodging under seal certain exhibits attached in support of Bard's Motion
to Exclude the Opinions of Darren M. Hurst, M.D., and Memorandum of Law in Support.
These exhibits, as well as the portions of Bard's Memorandum of Law that quote,
reference, or characterize them, contain certain Plaintiffs' personal healthcare information
that is protected under HIPAA and confidential under the Stipulated Protective Order.

1 Defendants have notified Plaintiffs of their intent to file this Notice of Lodging. Because
2 the documents lodged under seal only relate to Plaintiffs' personal healthcare information,
3 Defendants note that it is Plaintiffs' burden to file a motion to seal. A list of the Exhibits
4 sought to be sealed are attached hereto as Exhibit A.

5 RESPECTFULLY SUBMITTED this 24th day of August, 2017.

6
7 By: s/ Richard B. North, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on August 24, 2017, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to all attorneys of record.

s/ Richard B. North, Jr.

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EXHIBIT A

DOCUMENTS LODGED UNDER SEAL

Defendants lodge under seal the following documents in support of their Motion to Exclude the Opinions of Darren R. Hurst, M.D.

Exhibit A:	Hurst 6/5/17 Rule 26 Report as to Debra Mulkey
Exhibit B:	Hurst 8/7/17 MDL Deposition Transcript
Exhibit D:	Hurst 7/21/17 MDL Deposition Transcript
Exhibit E:	Hurst 8/19/16 <i>Austin</i> Deposition Transcript
Exhibit F:	Hurst 6/5/17 Rule 26 Report as to Doris Jones
Exhibit G:	Hurst 6/5/17 Rule 26 Report as to Lisa Hyde